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July 8, 1997

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JUL - 8 1997

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Attention: Policy and Rules Division  
Stop Code 1800D

Re: MM Docket Nos. 91-221, 87-8, 94-150, 92-51 and 87-154  
Television Station WCTD(TV), Miami, Florida

Dear Sir or Madam:

On behalf of Channel 35 of Miami, Inc., licensee of Television Station WCTD(TV), Miami, Florida, we submit herewith an original and four copies of the licensee's response to the FCC's June 17, 1997 *Public Notice* in the above-captioned proceedings. This submission concerns a Time Brokerage Agreement between Paxson Communications of Miami-35, Inc. and Channel 35 of Miami, Inc, the licensee of Television Station WCTD(TV), Miami, Florida.

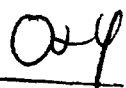
Should any questions arise concerning this matter, kindly contact the undersigned.

Very truly yours,

  
John R. Feore, Jr.

JRF/lkr  
Enclosure

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# LMA REPLY FORM

MARKET: MIAMI-FORT LAUDERDALE, FLORIDA

DMA #: 16

					Degree of Overlap (%)			Nielsen (all day) Audience Share (9am - midnight)		
					City Grade	Grade A	Grade B	11/96	2/97	5/97
Brokered Station:	Channel No. & Call Sign Channel 35 WCTD(TV)	Network Affiliation Independent	Licensed Community Miami, FL	Owner/ Licensee Channel 35 of Miami, Inc.				Not Available		
Brokering Station:	None	N/A	N/A	Paxson Communications of Miami-35, Inc.	N/A					

LMA Specifics:	Date of LMA <u>Signing</u>	Length of <u>Initial Term</u>	Initial Term <u>Start Date</u>	Initial Term <u>End Date</u>	<u>Renewal Provisions/Terms</u> Describe renewal provisions including: (1) length of renewal, (2) at which party's option, (3) whether renewal is automatic, and (4) how renewal option may be exercised.	% Time Brokered <u>per week</u>
	1/4/94	5 years	3/31/94	3/31/99	(1) 5 year renewal term (2) at Programmer's option (3) Notice of exercise of option to renew must be delivered to Licensee no later than 180 days prior to expiration of initial term	Up to 50% (84 hours/ week)

**PUBLIC INTEREST BENEFITS RESULTING FROM ENTERING INTO THE LMA**

## **PUBLIC INTEREST SHOWING FOR WCTD**

The WCTD(TV) Time Brokerage Agreement was combined with financing by Paxson Communications of Miami-35, Inc. that enabled Channel 35 of Miami, Inc. a subsidiary of The Christian Network, Inc. to acquire WCTD(TV), Miami, Florida. Without the programming opportunity, Paxson Communications would not have been willing to provide the financing for the acquisition of this station that enabled CNI to obtain an over-the-air outlet for its Worship programming for up to seventy hours per week.